

Quentin M. Rhoades
State Bar No. 3969
Robert Erickson
State Bar No. 9966
Rhoades, Siefert & Erickson PLLC
430 Ryman Street
Missoula, Montana 59802
Telephone: (406) 721-9700
qmr@montanalawyer.com
erickson@montanalawyer.com

Pro Querente

**IN THE FOURTH JUDICIAL DISTRICT COURT OF MONTANA
MISSOULA COUNTY**

**STEVE NELSON, MICHAEL
BOEHME, and BONNER
PROPERTY DEVELOPMENT, LLC,**

Plaintiff,

vs.

**PROJECT SPOKANE, LLC, and
SEAN WALSH,**

Defendants.

Cause No. **DV-32-2020-604-OC**
Dept. No. 1

***PLAINTIFFS' MOTION FOR
TEMPORARY RESTRAINING
ORDER AND ORDER TO SHOW
CAUSE WHY A PRELIMINARY
INJUNCTION SHOULD NOT BE
ENTERED***

1. Plaintiffs, Steve Nelson, Michael Boehme, and Bonner Property Development, LLC, request that the Court enter a temporary restraining order (TRO) enjoining the sale of millions of dollars of assets unilaterally scheduled by Defendants for Wednesday, June 3, 2020, at 10:00 a.m. Montana time, and to set a hearing on whether a preliminary injunction should be entered against sale of the assets pending entry of a final judgment in this case.

2. The motion is supported by separate filings including (a) a principal brief; (b) the Declaration of Steven Nelson (with exhibits); (c) a notice of compliance with Mont. U. D. C. R. 3 regarding ex parte matters; and (d) a proposed order.

DATED this 1st day of June 2020.

Respectfully Submitted,
RHOADES SIEFERT & ERICKSON PLLC

By: /s/Quentin M. Rhoades
Quentin M. Rhoades
Robert Erickson
Pro Querente

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of June 2020, I served a true and correct copy of the foregoing on the following persons by depositing said copy overnight delivery by FedEx, prepaid, and by email, addressed as follows:

Peter Ito
Ito Law Group
1550 Larimer Street, Suite 667
Denver, CO 80202
peter@itolawgroup.com

By: /s/ Quentin M. Rhoades
Quentin M. Rhoades

CERTIFICATE OF SERVICE

I, Quentin M. Rhoades, hereby certify that I have served true and accurate copies of the foregoing Motion - Motion to the following on 06-01-2020:

Project Spokane, LLC (Defendant)
365-B Clinton Street
Costa Meas 92626
Service Method: Email

Sean Walsh (Defendant)
365-B Clinton Street
Costa Mesa 92626
Service Method: Email

Electronically Signed By: Quentin M. Rhoades
Dated: 06-01-2020